

IN THE DISTRICT COURT FOR TULSA COUNTY  
STATE OF OKLAHOMA

SABER ACCEPTANCE CO., L.L.C., )  
Plaintiff, )  
-v- )  
JOHN C. HEATH, )  
ATTORNEY AT LAW, L.L.C. d/b/a )  
LEXINGTON LAW FIRM, )  
Defendant. )

**CJ-2017-05000**

JEFFERSON D. SELLERS

**SUMMONS**

TO: John C. Heath Attorney at Law, L.L.C.

You have been sued by the Plaintiff set forth above, and you are directed to file a written answer to the attached Petition in the court above set forth within twenty (20) days after service of this Summons upon you, exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the Plaintiff.

Unless you answer the Petition within the time stated, judgment will be rendered against you with costs of the action.

Dated this 18 day of 12, 2017.

DON NEWBERRY, Court Clerk      TULSA COUNTY COURT CLERK

(SEAL)

By:



Deputy

Chris Knight  
5314 South Yale Avenue, Suite 150  
Tulsa, OK 74135  
ATTORNEY FOR PLAINTIFF

This Summons was served on:      DATE: \_\_\_\_\_  
BY: \_\_\_\_\_  
Signature of Person Serving Summons

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THE SUMMONS.

**EXHIBIT**

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Chris Knight, P.C.  
5314 South Yale Ave., Suite 150  
Tulsa, OK 74135



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John C. Heath, Attorney at Law, L.L.C.,  
db/a Lexington Law Firm  
C/O John C. Heath  
360 North Cutler  
North Salt Lake, UT 84054

**\$6.65<sup>9</sup>**  
**US POSTAGE**  
**PRIORITY MAIL**

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Plaintiff, )

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DISTRICT COURT  
**F I L E D**

DEC 18 2017

**PETITION**

CON NEWBERRY, Court Clerk  
STATE OF OKLA. TULSA COUNTY

COMES NOW the Plaintiff and for its claim and cause of action  
alleges and states as follows:

**I.**

Defendant is a credit repair organization and its activities are  
regulated by the Credit Repair Organizations Act, 15 U.S.C. §1679.

**II.**

Plaintiff extends credit to individual consumer debtors and it is  
required to comply with the Fair Credit Reporting Act.

**III.**

Defendant intentionally sends communications to the Plaintiff  
that are deceptively written so as to appear to be from individual  
consumer debtors, rather than from a credit repair organization,  
because Defendant is aware that Plaintiff is required to respond to  
communications from individual consumer debtors whereas it is not

required to respond to communications from credit repair organizations.

IV.

Defendant sends said communications to the Plaintiff with the intent that the Plaintiff will rely upon the appearance of the communication as being from an individual consumer debtor and thereby be forced to respond to the same.

V.

Plaintiff has relied to its detriment upon the intentionally deceptive appearance of the communications from the Defendant causing it damages in the man hours, postage, and supplies expended in responding to said communications.

VI.

Defendant's conduct in sending the aforesaid communications is part of a malicious, willful, and intentional practice designed to enhance its profitability at the expense of the resources expended by entities such as the Plaintiff for which Defendant should respond in punitive damages.

WHEREFORE, Plaintiff demands judgment against the Defendant in an amount in excess of that required for diversity jurisdiction, together with the costs of this action, interest at the statutory rate, and any and all other relief to which Plaintiff may be entitled.

Respectfully Submitted,

  
Chris Knight OBA #11390  
5314 South Yale Avenue, Suite 150  
Tulsa, Oklahoma 74135  
(918) 496-1200